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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
17

18 CALIFORNIA SPORTFISHING
19 PROTECTION ALLIANCE,

20 Plaintiff,

21 v.

22 PACIFIC BELL TELEPHONE COMPANY,
23 Defendant.

CASE NO. 2:21-cv-00073-JDP

**NOTICE OF MOTION TO COMPEL
COMPLIANCE WITH SUBPOENA**

Judge: Hon. Jeremy D. Peterson

Complaint Filed: January 14, 2021

Zoom Hearing Date: November 9, 2023

Time: 10:00 a.m.

Courtroom: 9

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on November 9, 2023, at 10:00 a.m., or as soon thereafter as counsel may be heard via Zoom, Pacific Bell Telephone Company (Pacific Bell) will and hereby does move for an order directing Below the Blue (BtB) to produce all documents called for by the Subpoena that was served on August 9, 2023 within 14 days of the ruling on this motion. Pursuant to Judge Peterson's Procedures for Civil Matters, "[t]he court will issue a minute order advising counsel of the time and date of the conference. The Conference will be conducted via Zoom, and the court will provide the parties with the login information." Contact and other information for the Court and the Courtroom Deputy is available at the following website: <https://www.caed.uscourts.gov/CAEDnew/index.cfm/judges/all-judges/50231/>. A true copy of the Subpoena is attached as Exhibit B to the Declaration of Navi Singh Dhillon.

Because BtB is headquartered in South Lake Tahoe, California, Pacific Bell files this Motion to Compel in the Eastern District of California pursuant to Rule 45(d)(1).

This Motion is based upon the supporting Memorandum of Points and Authorities, the Declarations of Hariklia Karis and Navi Dhillon, all pleadings and materials on file with the Court, and all other matters presented to the Court before the Motion is taken under submission.

Respectfully submitted,

DATED: September 26, 2023

KIRKLAND & ELLIS

By: /s/ Hariklia Karis
HARIKLIA "CARRIE" KARIS

Attorney for Defendant
PACIFIC BELL TELEPHONE COMPANY